

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

DAVID URREGO ARTEAGA,

Case No. 23-320 M

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

KELSEY O'DONNELL, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about April 1, 2023, within the Eastern District of New York and elsewhere, the defendant DAVID URREGO ARTEAGA did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved a substance containing methamphetamine, a Schedule II controlled substance.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been since 2020. I am currently

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

assigned to the New York City Airport Border Enforcement Security Task Force Contraband Team I. During my time with HSI, I have been involved in the investigation of numerous cases involving drug trafficking and interdiction operations, including methamphetamine and drug trafficking through airports. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about April 1, 2023, at approximately 5:15 a.m., the defendant DAVID URREGO ARTEAGA arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Avianca S.A. airlines flight 42 from Rio Negro, Colombia.

3. During the screening process as part of the defendant's entry into the United States, officers with the United States Customs and Border Protection ("CBP") selected the defendant for secondary screening while he was in the Custom's area of the airport. At that time, CBP officers examined the defendant's backpack and observed what felt like a hard, crunchy substance in the lining of the bag. CBP officers then searched the defendant's bag and observed a plastic bag containing a rocky substance concealed in the bag's lining.

4. A field test of the hard, rocky substance revealed the presence of methamphetamine. The lining of the bag also contained another substance which was identified through the use of a field test to be norephedrine hydrochloride. I know from my training and experience, that this substance is a precursor used in the process of making methamphetamine.

5. The below photograph depicts the methamphetamine and norephedrine hydrochloride recovered from the defendant's bag:



6. In total, the plastic bag containing the hard, rocky substance identified as methamphetamine weighs approximately 70.18 grams.

7. Officers also observed plastic bags and a scale inside of the defendant's bag. I know from my training and experience that the plastic bags and scale observed inside of

the defendant's bag are consistent with the distribution of controlled substances. These items are depicted in the below photograph:



8. Following the recovery of the methamphetamine from the defendant's backpack, the defendant was provided with Miranda warnings and agreed to speak with investigators. At that time, the defendant admitted, in sum and substance, that he is involved with the distribution of controlled substances in the United States. Investigators also conducted a border search of the defendant's cell phone which revealed pictures of packages which appear to contain methamphetamine. The cell phone also contained conversations which I recognize from my training and experience appear to refer to the sale of controlled substances.

9. Subsequently, the defendant was placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant DAVID URREGO, be dealt with according to law.

Kelsey O'Donnell

KELSEY L
ODONNELL

Digitally signed by
KELSEY L ODONNELL
Date: 2023.04.01
15:24:48 -04'00'

KELSEY O'DONNELL
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me telephonically
on April 1, 2023

S/ Peggy Kuo

THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK